

AMY RHINEHART CRAVEN, as  
Administratrix of the Estate of  
CHRISTOPHER KIMMONS CRAVEN,  
  
Plaintiff,  
  
v.  
  
CHRISTOPHER NOVELLI, individually  
and in his official capacity as Officer of the  
Mooresville Police Department,  
ALEXANDER ARNDT, individually and  
in his official capacity as Officer of the  
Mooresville Police Department, and the  
TOWN OF MOORESVILLE,  
  
Defendants.

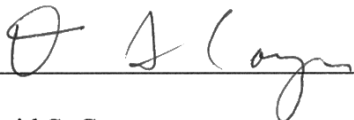
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- d. "Parties" means Plaintiff and Defendants in this action.
4. Counsel for the SBI, after reviewing this file and related documents, has determined that the SBI has no objection to producing the SBI Report to the parties for the following reasons:
- a. No policy reason exists for denial of the request of the parties for production of this material.
  - b. There is no prejudice to the SBI by releasing this material.
  - c. There are no identities of persons contained in this material which need to be protected, and
  - d. Any criminal investigation which might have been the subject of this file has been concluded.
5. Except as may be otherwise provided by further order of the Court, documents contained within the SBI Report shall be used for no purpose other than prosecuting or defending this action and shall be disclosed only to the persons identified below.
- a. The Court and its staff.
  - b. The parties and attorneys of record for the parties, and their legal assistants; other staff members, and law student clerks; insurers, their agents and employees; outside companies engaged by attorneys for the parties to photocopy such documents.
  - c. Any potential or actual deposition or trial witness when the documents are materially related to the questions asked to or testimony of such witness.
  - d. Mediators.
  - e. Consultants and technical experts involved in the preparation of this action.
  - f. Court reporters, their transcribers, assistants and employees.
  - g. The jury and trier of fact.
6. In addition, the above individuals and entities that are permitted access to the SBI Report materials and information are hereby ordered not to show, convey or reproduce any documents so designated or parts thereof, or copies thereof, or any matter contained therein, or any extracts or summaries thereof, to any individual, or to any entity that would not otherwise have access to said documents under the provisions of this Protective Order, except to the qualified persons listed above.

7. Counsel may make copies of material contained within the SBI Report for Plaintiff or Defendants' experts upon receiving from said experts a written agreement that they will be bound by the terms of this Protective Order. The requirement of obtaining such an agreement shall be satisfied by having each of Plaintiff or Defendants' experts read, acknowledge and agree in writing to be bound by this Protective Order. A file of all such written acknowledgments shall be maintained by Plaintiff and/or Defendants' counsel. By signing the declaration agreeing to be bound by this Protective Order, each of Plaintiff or Defendants' experts submits himself or herself to the jurisdiction of the Court for purposes of enforcement of this Protective Order.
8. The production or disclosure of documents and materials in the SBI Report, pursuant to the terms of this Order, shall not waive or prejudice the right of any party to object to the production or admissibility of documents or information on any applicable grounds.
9. This Protective Order shall not prevent any party, or the SBI, from applying to the Court for relief from this Protective Order or from applying to the Court for further or additional Protective Orders, or from agreeing between themselves to modification of this Protective Order, with the concurrence of the SBI and subject to the approval of the Court.

**SO ORDERED.**

Signed: January 19, 2022

  
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David S. Cayer  
United States Magistrate Judge



**AGREED TO BY:**

/s/ J. Alexander Heroy

J. Alexander Heroy

Jennifer M. Houti

JAMES, McELROY & DIEHL, P.A.

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/s/ Jennifer Joy Strickland

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